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Attorneys for Defendant Amis Integrity S.A.

by restricted appearance

#### UNITED STATES DISTRICT COURT

### FOR THE DISTRICT OF OREGON

### PORTLAND DIVISION

# DRY BULK SINGAPORE PTE. LTD,

Plaintiff,

v.

Amis Integrity S.A., *in personam* and M/V AMIS INTEGRITY (IMO 9732412) her engines, freights, apparel, appurtenances, tackle, etc., *in rem*,

Defendants.

Case No. 3:19-cv-01671

IN ADMIRALTY

DECLARATION OF MICHAEL NOLAN Q.C. IN SUPPORT OF REPLY IN SUPPORT OF MOTION FOR COUNTER-SECURITY

# I, MICHAEL NOLAN, Q.C., declares as follows:

- 1. I am over the age of majority and, except as otherwise indicated, make this declaration on personal knowledge, and am competent to testify regarding the facts contained herein.
- 2. I am a self-employed Queen's Counsel, practising from Quadrant Chambers, 10 Fleet Street, London EC4Y 1AU. I have been in practice as a barrister, specialising in DECLARATION OF M. NOLAN Q.C. Page 1 [Case No. 3:19-cv-01671]

{29293-00576369;1}

commercial law with a particular emphasis on shipping and commodities, since 1983, having been called to the Bar in 1981. I appear regularly in London arbitrations (especially those conducted under the auspices of the London Maritime Arbitrators' Association of which I am a supporting member) and in the Commercial and Admiralty Courts and the Court of Appeal in London. I also occasionally act as an arbitrator, usually in the field of maritime law.

3. I was asked to prepare the Opinion attached hereto as Exhibit 1.

I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE STATE OF OREGON AND THE UNITED STATES OF AMERICA THAT THE FOREGOING IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF.

DATED this 13th day of January, 2020 at London, United Kingdom.

MICHAEL NOLAN O.E.

DECLARATION OF M. NOLAN Q.C. - Page 2 [Case No. 3:19-cv-01671]

# **CERTIFICATE OF SERVICE**

I hereby certify that on January 14, 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to The Honorable Anna J. Brown and serve it on all associated counsel.

I certify under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

Signed at Seattle, Washington this 14th day of January, 2020.

# s/ Shelley Courter

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